

Nationál Environmental Achievement Track

Application Form

Name of facility	
Rhodia Inc Cranbury	, NJ
Name of parent compan	y (if any)
200 01 01 1 2 1	
399 Sims Chapel Road	
Street address	
Post Office Box 2643	
Street address (con	t.)
Street address (con	t.)
Spartanburg, SC 29306	- Street address
City/State/Zip code	29304-2643 - Po

address

Give us information about your contact person for the National Environmental Achievement Track Program.

Name	Howard E.C. (Hal) Brown, QEP, REM, C	ET
Title	Environmental Manager	
Phone	(864) 585-8393 xt30	
Fax	(864) 585-7561	
E-mail	hal.brown@us.rhodia.com	

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.



1	What do you do or make at your facility?	Surfactants (surface active agents)
		Non-ionic ethoxylates, propoxylates and block (capped) polymers
		Phosphate esters
		Ether sulfates
		Performance blends to customer specifications
2	List the Standard Industrial Classification (SIC) codes or	SIC
	North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.	_2843
		NAICS
3	Does your company meet the Small Business Administration definition of a small business for your sector?	Yes X No
	sector:	
4	How many employees (full-time equivalents) currently	Fewer than 50
	work at your facility?	X 50-99
		100-499
		500-1,000
		More than 1,000

Section A, continued

Does your facility have an EPA ID number(s)?	X Yes No
If yes, list in the right-hand column.	SCD 055 212 922
	29301GFCHMSIMSC
	USC00488
Identify the environmental requirements that apply to	
your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference.	
List your requirements to the right or enclose a	
completed Checklist with your application.	
7. Check the annuaryiete have in the right hand column	
7 Check the appropriate box in the right-hand column.	I've listed the requirements above.
	I've enclosed the Checklist with my application.
	and the second of the second o
Optional: Is there anything else you would like to tell us about your facility?	mitted to S.C. Environmental Excellence
	Program (11/98); first chemical manu- facturing facility to win the S.C. Gov- ernor's Pollution Prevention Award (9/99)
	wastewater pretreatment plant selected as Facility of the Year, Environmental Pro-
	tection magazine (11/99)

Wby do we need this information?

Facilities need to have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

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T_{e}	IIn	cab	nnii.	1/02/	Eh	15	
		******		4	one of R. s		

1	Check yes if your EMS meets the requirements for each element below as defined in the instructions.		
	A. Environmental policy	X	Yes
	b. Planning	X	Yes 100 - 10
	C. Implementation and operation	X	Yes
	d. Checking and corrective action	X	Yes
	e. Management review	X	Yes
?	Have you completed at least one EMS cycle (plan-do-check-act)?	X	Yes
}	Did this cycle include both an EMS and a compliance audit?	X	Yes
1	Have you completed an objective self-assessment or third-party assessment of your EMS?	X	Yes
	If yes, what method of EMS assessment did you use?	X	Self-assessment
			GEMI X Other Rhodia MSRR
		1000	CEMP Third-party assessment
			ISO 14001 Certification
			Other

Why do we need this information?

Facilities need to show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

Section C Tell us about your past achievements & future

eomenia in anti-

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions I and 2.

1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you need to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the prev (2 years ago)?	vious level	What is the curre	nt level?
Waste	Quantity	Units	Quantity	Units
Filter Cake from WWTP to landfill	54.67	tons	0.00	tons

i. How is the current level an improvement over the previous level?

We have completely eliminated -- for the last fourteen months -- a special wastestream that averaged over 300 tpy as recently as three years ago [See documentation attached from the landfill]

ii. How did you achieve this improvement?

Improved process management, data collection, and recirculation of sludge to achieve "steady-state" operating conditions; i.e., no mechanical methods used to extract excess solids from the system.

Second aspect you've selected

What aspect have you selected?	What was the p (2 years ago)?	revious level	What is the cu	rrent level?
Water	Quantity	Units	Quantity	Units
ROD released in effluent to SSSD	50,739	Pourida	(26.26.74 <i>8</i>	ag ⊊. pound s
		Toward 1		
i. How is the current level an imp previous level?	provement over the			
Overall wastewater	pretreatment	system perfo	rmance has	achieved
virtually optimal	operating cor	nditions sy	stemic effi	ciency_
improvements are r	eflected in	Lowered BOD re	eleased to t	he POTW
ii. How did you achieve this impr System optimization	n allows us t	o safely rema	in within pe	ermit limits
[See attached docu	mentation fro	m the SSSD] y	et reduce so	olids dis-
charged across the		and the second s	and the second	ing the figure of the second

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you are a small facility, you need to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect?

b. Is this aspect identified as significant in your EMS?

Y Yes

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

~2,000,000 pounds annually. X Option A: Absolute value (Quantity/Units)

Reduction of COD in effluent discharged to POTW.

Option B: In terms of units of production

(Quantity/Units)

or output

Section C, continued

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

Option A: Absolute value

<1,500,000 pounds annually by 2002

(Quantity/Units)

Option B: - Stock In terms of units of production or output

(Quantity/Units)

We can achieve this reduction by improving pretreatment plant operations; e. How will you achieve this improvement? specifically, by using our internal recycling process more effectively, so that our excess solids (as expressed as COD) are removed by an enhanced natural biological process.

Also, there are new, ongoing process sewer & sump mechanical upgrades the will dramatically reduce the amount of spilled product that can reach our pretreatment plant in the first place. Third, changes in our production mix will favor more production of products that have weaker COD values in reactor washouts.

GELOND

Third-aspect you've selected

- a. What is the aspect?
- b. Is this aspect identified as significant in your EMS?
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.
- e. How will you achieve this improvement?

Water -- BOD released in effluent to POTW



Option A:

Absolute value

36,722 pounds/year

(Quantity/Units)

Option B:

In terms of units of production or output

(Quantity/Units)

Option A:

Absolute value

25,000 pounds/year

(Quantity/Units)

Option B:

In terms of units of production or output

(Quantity/Units)

Maintain/improve biomass performance

(see above). According to our best

estimates using current data, 12 - 13 tpy is the theoretical maximum re-

duction in BOD released on an annual

basis.

THIKD Fourth-aspect you've selected

a.	What	is the	aspect?

b. Is this aspect identified as significant in your EMS?

- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.
- e. How will you achieve this improvement?

Waste - total solid waste to landfill

🛪 Yes No

X OptionA:
Absolute value 19

1999 - 217.5 tpy (Quantity/Units)

Option B: In terms of units of production or output

(Quantity/Units)

Option A:
Absolute value

less than 200 tpy (Quantity/Units)

Option B: In terms of units of production or output

(Quantity/Units)

Maintain zero shipments status from WWTP;

monitor/improve (decrease) other solid

wastes going to landfill

ection C. continues

Fourth aspect you've selected

TO MELLO OF CHILDREN WAS AND THE PROPERTY OF THE

a. What is the aspect?

Aspect: Reduction in total tonnage shipped offsite for disposal at our landfill.

b. Is this aspect identified as significant in your EMS? $^{\rm MS}$

X Yes

c. What is the current level? You may choose to state this as an absolute value or in terms of units of

production or output.

Option A: Absolute value **-225 t**ons a**nnually** (Quantity/Units)

Option B: In terms of units of production or output

(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

Option A: Absolute value ~2**00** tons annually by 2002.

(Quantity/Units)

Option B: In terms of units of production or output

(Quantity/Units)

e. How will you achieve this improvement?

In addition to the 150-250 tons (minimum)annually of special waste from our pretreatment plant that have already been eliminated, we will increase the effectiveness of our existing office paper recycling, aluminum can recycling, and, most important, our cardboard recycling programs. There will

be an even more active effort to receive more raw materials in composite cardboard shell/plastic liner style tote containers. We will also changeover

the packaging mix of our biggest volume dry raw material from more bags/less

Super-sacks (which are recyclable as well), to almost no bags/all Supersacks. This alone will eliminate several tons of empty bags now going to the landfill. Another change in product design/capital \$\$ commitment is the installation of more new bulk storage tanks. This will eliminate

thousand empty steel drums every year that have to go to the landfill. (Some

of our steel drums -- and almost 100% of our plastic drums -- can be recycled, and we are already doing so. However, some drummed raw materia are packaged in non-recycleable drums (particularly from our overseas suppliers).

Why do we need this information?

Facilities need to demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1	How do you identify and respond to community	Membership in LEPC (leadership role)
•	concerns?	Membership in Environmental Interest
		Forum (peer-to-peer)
		Active sponsorship of Arkwright VFD
		Ongoing involvement with Re-Genesis
		Project (community renewal)
2	How do you inform community members of important matters that affect them?	Several employees are also members of
		the local community
		Open-house celebration events Orientation & training for Arkwright
		VFD on site
		TID OIL STEE
3	How will you make the Achievement Track Annual Performance Report available to the public?	X Website www.rhodia.com
	remormance Report available to the public:	X Newspaper
		X Open Houses
		Other

Section D

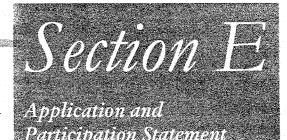
Tell us about your public

outreach and reporting.

4	Are there any	ongoing cit	izen suits agai	nst your facilit	y?	Yes	X No		eliger (1997) In protestr	
	If yes, describ	e briefly in t	he right-hand	column.				32	A STATE OF THE STA	
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					ing the same			Jan Sata		
				e Specifica		ing the state of t	. W. S. J. J.		in Paraditi	
			•		The proper	anti di sala		ej legel	n y et linger j	

5 List references below.

	Organization	Name	Phone	e number	
Representative of a Community/	Re-Genesis	Harold N	. Mitchell	(864)	542-8420
Citizen Group					
•			1		
State/Local regulator	SCDHEC - App. III	Ronald R	. Garrett	(864)	596-3800
Other community/local	SSSD - IWT	John Hol	comb	(864)	582-3250
reference .				en e	



On behalf of Rhodia Inc. - Spartanburg, SC [my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the National Environmental Achievement Track Description;
- I have personally examined and am familiar with the information contained in this Application (including, if
 attached, the Environmental Requirements Checklist). The information contained in this Application is, to
 the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no
 reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS
 requirements, including systems to maintain compliance with all applicable federal, state, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's
 participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary),
 my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with
 applicable federal, state, and local environmental requirements;

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other

legal entity whose	facility is applying to this pr	rogram.
	Signature/Date	August 3, 2000
	Printed Name/Title	James M. Trafton, Plant Manager
	Facility Name	Rhodia Inc Spartanburg, SC
	Facility Street Address_	399 Sims Chapel Road, Spartanburg, SC 29306
	Facility ID Numbers	SCD 055 212 922
		29301GFCHMSIMSC

USC00488

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this *Checklist* and choose to submit it with your application, fill in your facility information below and enclose the completed *Checklist* with your application (see instructions).

Facility Nam	ne: Rhodia Inc.	
Facility Loca	ation: Spartanburg, SC	
Facility ID N	Number(s): SCD 055 212 922; 29301GFCHMSIMSC	
(attach addit	tional sheets if necessary)	
•		Check All
Air Pollution	1 Regulations	That Apply
1. 2.	National Emission Standards for Hazardous Air Pollutants (40 CFR 61)	X G
2. 3.	Permits and Registration of Air Pollution Sources	
3. 4.	General Emission Standards, Prohibitions and Restrictions Control of Incinerators	X G
5.	Process Industry Emission Standards	G
5. 6.	Control of Fuel Burning Equipment	X G
7.	Control of VOCs	G
8.	Sampling, Testing and Reporting	G
9.	Visible Emissions Standards	x G
10.	Control of Fugitive Dust	G
11.	Toxic Air Pollutants Control	G
12.	Vehicle Emissions Inspections and Testing	G
		* a.,
Other (identify)	r Federal, State, Tribal or Local Air Pollution Regulations Not Listed	i Above
13.	N/A	G

1.	Identification and Ligting of Hazardova Wasta (40 CED 261)
1.	Identification and Listing of Hazardous Waste (40 CFR 261) - Characteristic Waste
2.	- Listed Waste Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
5.	- Manifesting - Pre-transport requirements
3.	- Record keeping/reporting Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
	- Transfer facility requirements - Manifest system and record-keeping
4.	- Hazardous waste discharges Standards for Owners and Operators of TSD Facilities (40 CFR 264)
	- General facility standards - Preparedness and prevention
	- Contingency plan and emergency procedures - Manifest system, Record keeping and reporting
	- Groundwater protection - Financial requirements
	Use and management of containersTanks
	- Waste piles
	- Land treatment - Incinerators
5. 6.	Interim Status Standards for TSD Owners and Operators (40 CFR 265) Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
7.	Administered Permit Program (Part B) (40 CFR 270)
	Federal, State, Tribal or Local Hazardous Waste Management Regula Above (identify)
	N/A

Hazardous Materials Management

14.

. P.	1.	Control of Pollution by Oil and Hazardous Substances (33 CFR 153)	X	G
	2.	Designation of Reportable Quantities and Notification of Hazardous		
		Materials Spill (40 CFR 302)	X	G
	3.	Hazardous Materials Transportation Regulations (49 CFR 172-173)	X	G
	4.	Worker Right-to-Know Regulations (29 CFR 1910.1200)	X	in diamonia.
	5.	Community Right-to-Know Regulations (40 CFR 350-372)	X	G
- 1				
Į,				
	Other	Federal, State, Tribal or Local Hazardous Materials Management Re	gulat	ions
4		sted Above (identify)		
. 4				
	6.	N/A		G
	7.	en e		G
Solid V	Waste N	<u> Management</u>		
	1.	Criteria for Classification of Solid Waste Disposal Facilities		
		and Practices (40 CFR 257)		G
	2.	Permit Requirements for Solid Waste Disposal Facilities		G
	3.	Installation of Systems of Refuse Disposal		G
	4.	Solid Waste Storage and Removal Requirements		G
	5.	Disposal Requirements for Special Wastes	· ·	G
	Other	Federal, State, Tribal or Local Solid Waste Management Regulation	s No	Listed
	Above	e (identify)		
	. '			
	6.	N/A		G
	7.			G
Water	<u>Polluti</u>	on Control Requirements		
		ϕ_{ij} , ϕ_{ij} , ϕ_{ij}		
	1.	Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)		G
	2.	Designation of Hazardous Substances (40 CFR 116)	Х	G
	3.	Determination of Reportable Quantities for Hazardous Substances		
		(40 CFR 117)	X	G
	4.	NPDES Permit Requirements (40 CFR 122)		G
	5.	10.110 1 011.1111 0111 01111 01111 (10 01 11 12)	•	
	6.	General Pretreatment Regulations for Existing and New Sources (40 CFR	103)	G
	7.	Organic Chemicals Manufacturing Point Source Effluent Guidelines		
		and Standards (40 CFR 414)		G

	and Standards (40 CFR 415)
9.	Plastics and Synthetics Point Source Effluent Guidelines and Standards
J.	(40 CFR 416)
10.	Water Quality Standards
11.	Effluent Limitations for Direct Dischargers
12.	Permit Monitoring/Reporting Requirements
13.	Classifications and Certifications of Operators and Superintendents
13.	of Industrial Wastewater Plants
14.	Collection, Handling, Processing of Sewage Sludge
15.	Oil Discharge Containment, Control and Cleanup
15. 16.	Standards Applicable to Indirect Discharges (Pretreatment)
10.	Standards Applicable to induced Discharges (Frededition)
Otho	r Federal, State, Tribal or Local Water Pollution Control Regulations Not 1
	r rederal, State, Tribal or Local water robution Control Regulations Not in (identify)
ADUV	• (taentijy)
17.	Spartanburg Sanitary Sewer District Permit #013
17.	
18.	
10.	
10.	
	iter Regulations
king Wa	
	Underground Injection and Control Regulations, Crieria and Standards
king Wa	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146)
king W a 1. 2.	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) National Primary Drinking Water Standards (40 CFR 141)
king Wa	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) National Primary Drinking Water Standards (40 CFR 141) Community Water Systems, Monitoring and Reporting Requirements
1. 2. 3.	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) National Primary Drinking Water Standards (40 CFR 141) Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)
king W a 1. 2.	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) National Primary Drinking Water Standards (40 CFR 141) Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) Permit Requirements for Appropriation/Use of Water from Surface or
1. 2. 3. 4.	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) National Primary Drinking Water Standards (40 CFR 141) Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
1. 2. 3. 4.	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) National Primary Drinking Water Standards (40 CFR 141) Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources Underground Injection Control Requirements
1. 2. 3. 4.	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) National Primary Drinking Water Standards (40 CFR 141) Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources Underground Injection Control Requirements Monitoring, Reporting and Record keeping Requirements for Community
1. 2. 3. 4.	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) National Primary Drinking Water Standards (40 CFR 141) Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources Underground Injection Control Requirements
1. 2. 3. 4. 5. 6.	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) National Primary Drinking Water Standards (40 CFR 141) Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources Underground Injection Control Requirements Monitoring, Reporting and Record keeping Requirements for Community Water Systems
1. 2. 3. 4. 5. 6.	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) National Primary Drinking Water Standards (40 CFR 141) Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources Underground Injection Control Requirements Monitoring, Reporting and Record keeping Requirements for Community Water Systems r Federal, State, Tribal or Local Drinking Water Regulations Not Listed A
1. 2. 3. 4. 5. 6.	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) National Primary Drinking Water Standards (40 CFR 141) Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources Underground Injection Control Requirements Monitoring, Reporting and Record keeping Requirements for Community Water Systems r Federal, State, Tribal or Local Drinking Water Regulations Not Listed A
1. 2. 3. 4. 5. 6. Othe	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) National Primary Drinking Water Standards (40 CFR 141) Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources Underground Injection Control Requirements Monitoring, Reporting and Record keeping Requirements for Community Water Systems r Federal, State, Tribal or Local Drinking Water Regulations Not Listed Altify)
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1. 2. 3. 4. 5. 6. Othe	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) National Primary Drinking Water Standards (40 CFR 141) Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources Underground Injection Control Requirements Monitoring, Reporting and Record keeping Requirements for Community Water Systems r Federal, State, Tribal or Local Drinking Water Regulations Not Listed Altify)

Manufacture and Import of Chemicals, Record keeping and Reporting 1.

	Requirements (40 CFR 704)	X C
2.	Import and Export of Chemicals (40 CFR 707)	X C
3.	Chemical Substances Inventory Reporting Requirements (40 CFR 710)	•
4.	Chemical Information Rules (40 CFR 712)	Œ
· · 5.	Health and Safety Data Reporting (40 CFR 716)	X
6.	Pre-Manufacture Notifications (40 CFR 720)	X C
7.	PCB Distribution Use, Storage and Disposal (40 CFR 761)	•
8.	Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)	•
9.	Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)	•
Othe	r Federal, State, Tribal or Local Toxic Substances Regulations Not Lis	ted Ab
(iden	tify)	
10.	N/A	
11.		
sticide Re	<u>gulations</u>	
1.	FIFRA Pesticide Use Classification (40 CFR 162)	
2.	Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165)	
3.	Certification of Pesticide Applications (40 CFR 171)	
4.	Pesticide Licensing Requirements	
5.	Labeling of Pesticides	
6.	Pesticide Sales, Permits, Records, Application and Disposal Requirements	
7.	Disposal of Pesticide Containers	
8.	Restricted Use and Prohibited Pesticides	
Othe	r Federal, State, Tribal or Local Pesticides Regulations Not Listed Ab	ove (id
9.	N/A	
10		
10.		(
	tal Clean-Up, Restoration, Corrective Action	
	ttal Clean-Op, Restoration, Corrective Action	
vironmei		
vironmei 1.	Comprehensive Environmental Response, Compensation and Liability	
	Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)	
	Act (Superfund) (identify)	
	• • • • • • • • • • • • • • • • • • • •	

N/A	



PALMETTO LANDFILL A WASTE MANAGEMENT COMPANY

251 New Hope Road Wellford, South Carolina 29385 (864) 439-9184 (864) 439-0097 Fax

June 26, 2000

Rhodia, Inc. Hal Brown Post Office Box 2643 Spartanburg, South Carolina 29304-2643

RE: Profile WMNA 049765 for Activated Sludge

Dear Hal:

I am writing in recognition of your facilities effort to minimize your waste streams. Attached you will find the history for the past four years of the activated sludge material. During these years you have spent considerable efforts to reduce the amount of material coming to Palmetto Landfill. As you can tell by the history we have not received any sludge from this profile at your facility since July 8, 1999.

We want to commend you on your environmental achievements. This effort saves precious space in the landfill.

Should you have any questions, on the history or would need additional information, please do not hesitate to contact me at (864) 439-8426. We value the relationship we have with Rhodia and look forward to building upon our partnership.

Sincerely, Palmetto Landfill

David W. Pepper, P.G.

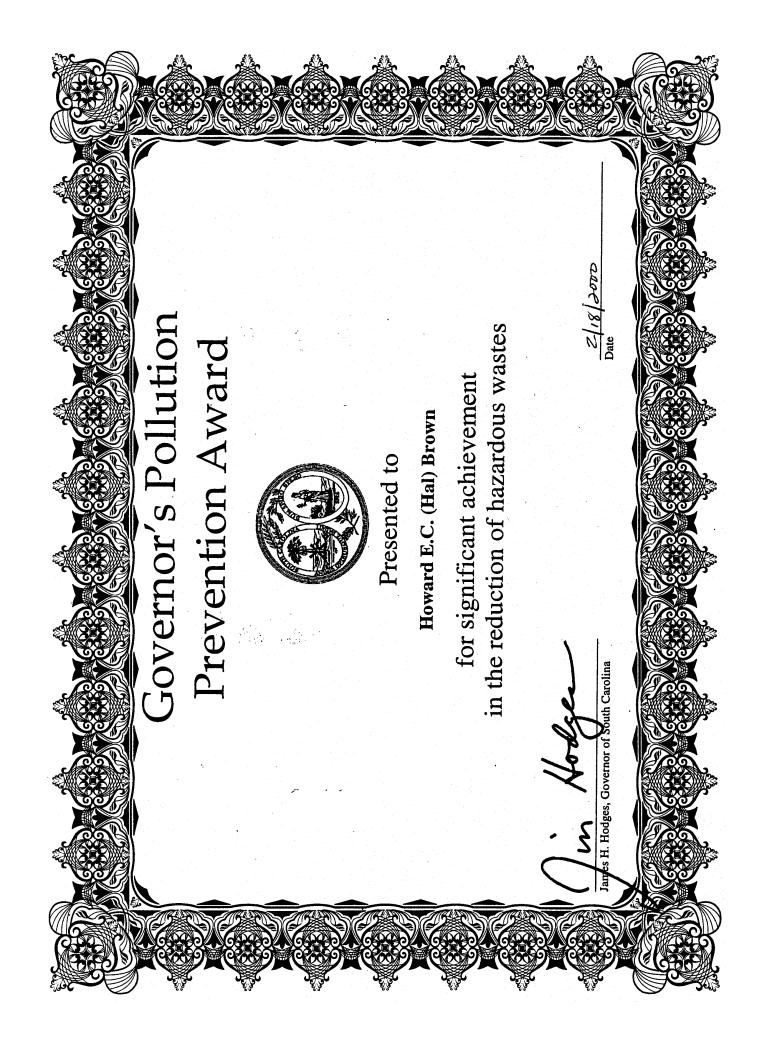
District Manager

Enc.

1996		1997	CONTINUED
DATE	WEIGHT	DATE	WEIGHT
01/05/06	04400 1 DC	10/09/07	10700 I DC
01/05/96	24480 LBS	10/28/97	18700 LBS
01/22/96	27100 LBS	11/10/97	20120 LBS
02/02/96	22460 LBS	11/19/97	21960 LBS
02/13/96	25800 LBS	11/28/97	21640 LBS
02/21/96	23820 LBS	12/13/97	23260 LBS
03/04/96	23860 LBS		
03/13/96	24540 LBS	GRAND TOTAL 1	997 (17 LOADS 186.21 TONS)
03/21/96	21600 LBS		
03/29/96	26080 LBS		
04/03/96	20220 LBS	1998	
04/10/96	20960 LBS		
04/18/96	25660 LBS	01/31/98	22920 LBS
04/26/96	25080 LBS	02/12/98	20700 LBS
05/03/96	21760 LBS	02/27/98	18420 LBS
05/10/96	21100 LBS	04/29/98	24660 LBS
05/22/96	21880 LBS	12/22/98	22640 LBS
06/03/96	28240 LBS		
06/17/96	27860 LBS	GRAND TOTAL 1	1998 (5 LOADS 54.67 TONS)
06/26/96	22440 LBS		
07/16/96	23600 LBS	1999	
08/08/96	24540 LBS		
10/03/96	22160 LBS	02/17/99	25420 LBS
11/05/96	35300 LBS	04/07/99	25500 LBS
11/13/96	25100 LBS	07/08/99	20720 LBS
11/26/96	24880 LBS	GRAND TOTAL	1999 (3 LOADS 35.82 TONS)

GRAND TOTAL 1996 (25 LOADS 299.43 TONS)

21820 LBS
21720 LBS
21240 LBS
19420 LBS
22900 LBS
23000 LBS
21420 LBS
20100 LBS
21200 LBS
22600 LBS
26780 LBS
24540 LBS



ENVIRONMENTAL EXCELLENCE PROPERTY

certifies that.

Rhodia, Inc.

Spartanburg

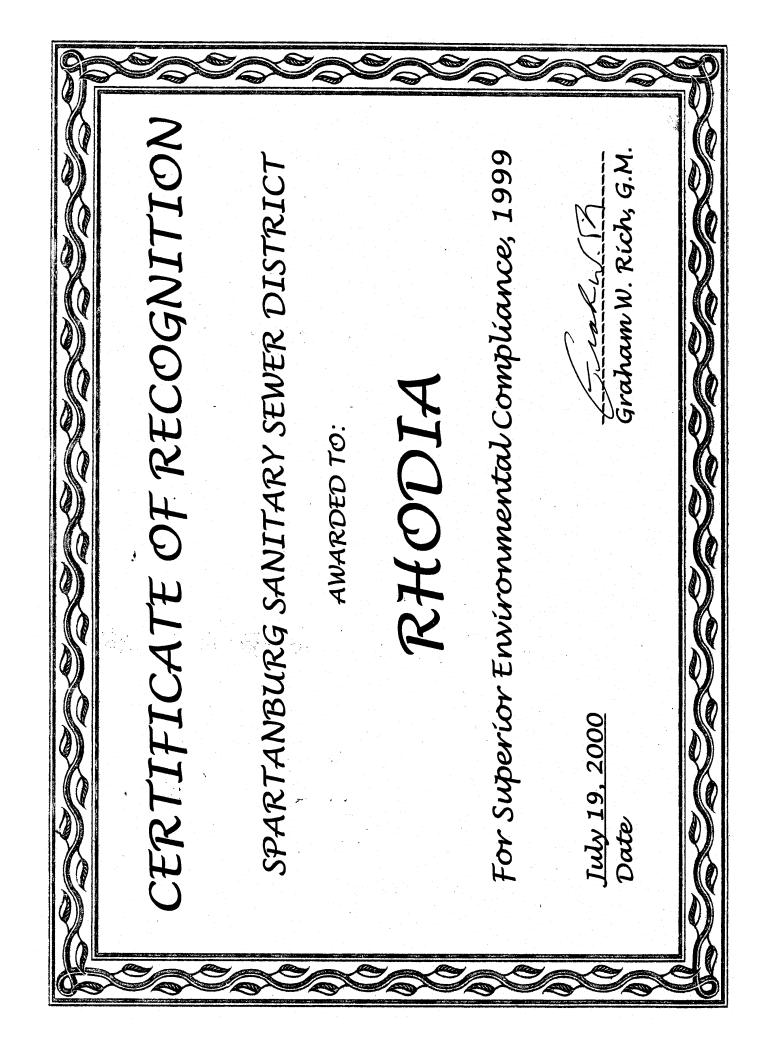
is a member in good granding

November 1998 November 2000

in recognition of its commitment to protecting and preserving South Caroling's environment

Executive Praction Institute of Pull Co

SOUTH CAROLINA ENVIRONMENTAL EXCELLENCE PROGRA Chāirman Tritonmen dzi 1900



	1995	1996	1997	1998	1999	% Change	
Provinceton Pounds Produced	65,289,000	71,886,600	76,082,780	82,218,000	86,558,000	5.28%	76,406,876
	12,825,495	13,630,148	13,459,313	14,203,836	11,750,318	-17.27%	13,173,822
Effluent Flow (als.)	13,247,501	13,583,098	12,562,438	12,531,278	14,222,000	13.49%	13,229,263
Influent COD (lbs)	1,485,409	1,725,159	1,957,773	2,343,329	2,336,828	-0.28%	1,969,700
Waste Water Effluent COD (lbs)	755,945	603,517	703,191	792,617	652,069	-21,14%	890'969
	49.11%	65.02%	64.08%	66.18%	73.25%	10.68%	63.53%
Effluent COD Pounds/10K Production	115.78	83.95	92.42	96.40	72.21	-25.09%	92.16
Effluent BOD (lbs.)	61,715	36,531	31,944	39,401	32,500	-17.51%	40,418
Effluent BOD Pounds/10K Production	9.45	5.08	4.20	4.79	3.75	-21.65%	5.46
Effluent TSS (lbs.)	17,259	8,902	26,399	26,410	21,350	-19.16%	20,064
Effluent Oil & Grease (lbs.)	1,025	581	704	627	605	-3.51%	708
Enriched Seed Sludge (gls)			47,648	65,524	20,501	-68.71%	44,558
Friched Seed Sludge (lbs)	New British	Alla	397,480	546,799	170,900	-68.75%	371,726
Digester Decant Discharged (gls)			37,440	192,460	.36,975	-80.79%	88,958
DHEC Lab Analytical Costs			\$3,957	\$2,808	\$2,459.80	£12.40%	\$3,074.87
Pounds Shipped Offsite	239,000	303,060	338,140	444,660	185,890	-58.20%	302,150
Pounds Waste/1K Production	3.66	4.22	4.44	5.41	2.15	-80.29%	3.98
	\$17,585.10	\$22,185.55	\$19,429.51	\$25,934.72	\$8,193.50	-68.41%	\$18,665.68
	\$147.16	\$146.41	\$114.92	\$116.65	\$88.15	-24.43%	\$122.66
Total Waste \$\$/10K Production	\$2.69	\$3.09	\$2.55	\$3.15	\$0.95	-69.99 %	\$2.49
SWS Water in (dis.)	17,525,640	20,641,808	18,783,776	21,778,492	24,831,356	14.02%	20,712,214
SWS Water In Cost (\$)	\$22,874.74	\$29,484.16	\$29,902.49	\$38,332.19	\$47,604.00	24.19%	\$33,639.52
Santana SSSD Discharge (als.)	12,943,000	13,656,900	12,262,700	12,095,800	14,660,200	21.20%	10,191,680
	\$30,220.08	\$32,602.81	\$30,135.21	\$29,725.25	\$36,773.89	23.71%	\$31,891.45
	133,464	56,952	51,135	50,439	30,147	-40.23%	64,427
Meries SSSD BOD Charge (\$)	\$18,524.95	\$7,904.55	\$7,097.60	\$7,001.00	\$4,184.64	40.23%	\$8,942.55
	\$3,013.48	\$5,281.67	\$1,429.10	\$1,436.60	\$1,442.60		\$2,520.69
Total SWS/SSSD Costs (\$)	\$74,633.25	\$75,273.19	\$68,564.40	\$76,495.04	\$90,004.95	_	\$76,994.17
SWS & SSSD \$/10K Production	\$11.43	\$10.47	\$9.01	\$9.30	\$10.40	11.78%	\$10.12
Discarded Containers (tons)	40.11	31.82	48.37	57.63	74.34	29.00%	50.45
Discarded Containers (\$)	\$4,975.56	\$3,838.70	\$6,269.93	\$5,617.09	\$7,811.82	39.07%	\$5,702.62
Polimetta Production Filtrate (tons)	146.65	94.35	98.31	125.73	101.72	-19.10%	113.35
	\$6,770.22	\$5,061.50	\$5,915.79	\$9,018.45	\$8,593.80	-4.71%	\$7,071.95
	247.16	298.13	208.53	54.67	23.11	-57.73%	166.32
	\$11,445.04	\$12,924.48	\$10,870.35	\$5,549.49	\$3,273.51	-41.01%	\$8,812.57
	16.86	0.78	12.29	44.72	7.96	-82.20%	16.52
	\$4,907.36	\$278.01	\$2,128.44	\$5,666.01	\$498.98	-91.19%	\$2,695.76
Total Solid Waste to PLF (tons)	450.78	425.08	367.50	282.75	217.50	-23,08%	348.72
Total Solid Waste to PLF (\$)	\$28,098.18	એ	\$25,184.51	\$25,851.04	\$25,746.18		\$25,396.52
Total Di F \$\$/40K Production	\$4.30	1_	\$3.31	\$3.14	\$2.97	-5.40%	\$3.36

